

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MILDRED ANNE DUDLEY,
*Individually and on behalf of others
similarly situated,*

Plaintiff,

v.

REGIONS FINANCIAL
CORPORATION and MORGAN
KEEGAN & COMPANY, INC.

Defendants.

CIVIL NO. 1:11-cv-02700-RLV

**NAMED PLAINTIFF'S EMERGENCY MOTION TO QUASH THIRD-
PARTY SUBPOENA, FOR A PROTECTIVE ORDER, AND FOR AN
IMMEDIATE HEARING**

Pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure and Rule 7 of the Civil Local Rules of Practice for the United States District Court for the Northern District of Georgia, Named Plaintiff submits her Emergency Motion to Quash Third-Party Subpoena, for a Protective Order, and for an Immediate Hearing.

For the reasons set forth in her memorandum of law in support of her motion, Named Plaintiff requests that the Court quash the third-party subpoena that Defendant Morgan Keegan has served on Named Plaintiff' current employer,

Georgia Power. In addition, Named Plaintiff respectfully requests that the Court enter a protective order (1) prohibiting Morgan Keegan from using any documents or information it obtains through the subpoena, (2) prohibiting Morgan Keegan from further contacting Georgia Power regarding Plaintiff or this lawsuit, and (3) directing Morgan Keegan to provide Plaintiff with seven days notice of any further third-party subpoenas.

Lastly, Plaintiff requests an immediate hearing in person or by telephone before the Court. As set forth in her memorandum of law in support of her motion, Morgan Keegan served the subpoena on Georgia Power on Wednesday, January 11, 2012. Plaintiff's counsel worked in good faith to resolve this dispute with Defendant Morgan Keegan's counsel through Friday, January 13, 2012, but was unable to do so. Accordingly, Plaintiff filed her motion on Tuesday, January 17, 2012. However, in the subpoena at issue, Morgan Keegan has commanded that Georgia Power produce the documents requested on or before January 30, 2012. Therefore, pursuant to Local Rule 7.1(B), Morgan Keegan's response to Named Plaintiff's motion would not be due until after the deadline for Georgia Power to respond to the subpoena. Accordingly, for good cause shown and pursuant to Local Rule 7.2(B), Plaintiff respectfully requests that the Court waive the time

requirements of Local Rule 7 and grant an immediate hearing on Plaintiff's motion to quash, for a protective order, and for an immediate hearing.

Dated: December 17, 2011

Respectfully submitted,

s/G. Blake Andrews

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